

*L.A. Taxi Coop., Inc. et al. v. Uber Tech., Inc. et al.*  
**Case No. 3:15-cv-01257-JST**  
**Exhibit to Joint Discovery Letter**

**INTERROGATORY NO. 19:**

State YOUR definition of the term “industry” as that term is alleged in paragraphs 63-67, 70, 78, 82, 101-102, and 117 of the COMPLAINT, including without limitation by listing all entities that operate in YOUR “industry.”

**PLAINTIFFS’ RESPONSE TO INTERROGATORY NO. 19:**<sup>1</sup>

Plaintiff incorporates by reference the Preliminary Statement, General Objections, and Objections to Definitions set forth above. Plaintiff further objects to the extent that the information sought is protected by the attorney-client privilege, the attorney work product doctrine, and/or is otherwise privileged and/or protected from discovery. Plaintiff further objects to the Interrogatory on the grounds that it is unduly burdensome, overbroad, and is not phrased in a manner by which Plaintiff could reasonably respond. Furthermore, each and every entity operating in Plaintiff’s industry is not currently known by Plaintiff, nor is it reasonably obtainable. Based on this objection, Plaintiff cannot respond to this part of the Interrogatory. Subject to and without waiving all general and specific objections, Plaintiff responds as follows:

Plaintiff is only able to respond to the use of the term “industry” in paragraph 117 of the Complaint due to the fact that the use of the term in paragraphs 63-67, 70, 78, 82, 101-102 quotes statements made by Defendants. With respect to Plaintiff’s use of the term “industry” in paragraph 117 of the Complaint, Plaintiffs incorporate Black’s Law Dictionary definition of the term “industry” as: A particular form or branch of productive labor; an aggregate of enterprises employing similar production and marketing facilities to produce items having markedly similar characteristics. INDUSTRY, Black’s Law Dictionary (10th ed. 2014). Plaintiff’s use of the term “industry” in the phrase “taxi cab industry” refers to the holder of a permit to operate in a particular jurisdiction.

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<sup>1</sup> Although they did not respond jointly, all Plaintiffs provided identical responses.